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May 3, 2012

BY HAND/ECF

Honorable Steven M. Gold
United States Chief Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East, Room 13D
Brooklyn, New York 11201

Re: Rodriguez v. St. Vincent's
Services, et al
Civil Docket No.: 10-CV-4661

Patrick Alford v. The City of
New York, et al
Civil Docket No.: 11-CV-1583
10-CV-04661

P.A., Jr. v. City of New York; et al
Civil Docket No.: 10-CV-04661

Our File No.: 06100-16617

Dear Magistrate Gold:

This office represents the interests of St. Vincent's Services, Inc. s/h/a St. Vincent's Services Incorporated, Carlene Anderson, and Zoila Villalta in the above-referenced matters.

Pursuant to Paragraph I (D) of Your Honor's Individual Practices, we respectfully request that the Court grant an extension of the deadline for the submission of the schedule for the party and non-party witness depositions. At the most recent appearance, the date for submission was set as May 2, 2012. Counsel for all parties consent to this request. No prior

Hon. Steven M. Gold

-2-


May 3, 2012

request for an extension of the deadline for submission of the deposition schedule has been requested previously.

As noted in last night's submission by counsel for P.A., Jr., all counsel are engaged in a continuing effort to create such a schedule. Since there is another deadline involving scheduling the deposition of Mr. Alford-May 9th-which involves its own logistical issues, it is requested that the time for submission of the schedules for the other party and nonparty witnesses be extended to at least May 9, 2012 as well.

We thank the Court in advance for its anticipated cooperation.

Respectfully submitted,


Charles E. O'Bryan

CEO:dml

cc: VIA HAND/ECF

Honorable John Gleeson
United States District Court
Eastern District of New York
225 Cadman Plaza, Room 727 S
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VIA ECF

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Hon. Steven M. Gold

-3-

May 3, 2012

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